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8
9 **UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION**

11 EDWARD DUNAGAN,
12 Plaintiff,

13 vs.

14 WELLS FARGO BANK, N.A.,
15 Defendant.

Case No. 3:15-cv-04826-CRB
Hon. Judge Charles R. Breyer

Ctrm. 6

CLASS ACTION

**STIPULATION TO TRANSFER VENUE
PURSUANT TO 28 U.S.C. § 1404(a);
~~[PROPOSED]~~ ORDER**

Action Filed: October 20, 2015
Trial Date: None Set

18 Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) and Plaintiff Edward Dunagan
19 (“Plaintiff”) (collectively referred to as the “Parties”), through their respective counsel of record
20 hereby agree and stipulate as follows:

21 WHEREAS, Plaintiff filed his class action complaint in this matter on October 20, 2015, in
22 the United States District Court for Northern District of California;

23 WHEREAS, subject to one stipulation enlarging time, Wells Fargo’s time to file its
24 responsive pleading was extended to December 7, 2015;

25 WHEREAS, Plaintiff contends he resides in Southern California and his attorneys
26 handling this matter are not located in the Northern District of California;

27 WHEREAS, Wells Fargo contends its witnesses in this matter and handling attorneys are
28 not located in the Northern District of California and are mainly located in Southern California;

1 WHEREAS, the Parties stipulate and agree that the United States District Court for the
2 Southern District of California (“Southern District”), has superior connection to this case under
3 the applicable private and public interest factors; and,

4 WHEREAS, the parties agree that the Southern District is a viable and appropriate
5 alternate venue;

6 NOW, THEREFORE, IT IS HEREBY STIPULATED:

7 1. This action shall be transferred to the United States District Court for the Southern
8 District of California;

9 **IT IS SO STIPULATED.**

10 DATED: December 2, 2015

SEVERSON & WERSON
A Professional Corporation

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13 By: /s/ Scott D. Goldsmith
14 Scott D. Goldsmith
Attorneys for Defendant WELLS FARGO BANK, N.A.

15
16 DATED: December 2, 2015

KAZEROUNI LAW GROUP, APC

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19 By: /s/ Abbas Kazerouni
20 Abbas Kazerouni
Attorneys for Plaintiff EDWARD DUNAGAN

1 Pursuant to Local Civil Rule 5-1(i)(3) regarding signatures, I, Scott D. Goldsmith, attest
2 that concurrence in the filing of this document has been obtained from each of the other
3 signatories.

4 DATED: December 2, 2015

SEVERSON & WERSON
A Professional Corporation

7 By: /s/ Scott D. Goldsmith
8 Scott D. Goldsmith
9 Attorneys for Defendant WELLS FARGO BANK, N.A.

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Pursuant to 28 U.S.C. § 1404(a), the Court DIRECTS the clerk to transfer this action, in its entirety, to the Southern District of California, for all further proceedings.

DATED: December 6, 2015

By:



Honorable Charles R. Breyer
United States District Court Judge